

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re

CENTER CITY HEALTHCARE, LLC d/b/a
HAHNEMANN UNIVERSITY HOSPITAL,
et al.,¹

Debtors.

CENTER CITY HEALTHCARE, LLC, d/b/a
HAHNEMANN UNIVERSITY HOSPITAL,
PHILADELPHIA ACADEMIC HEALTH
SYSTEM, LLC, ST. CHRISTOPHER'S
HEALTHCARE, LLC, and SCHC
PEDIATRIC ASSOCIATES, LLC,

Plaintiffs,

v.

MEDLINE INDUSTRIES INC.,

Defendant.

Chapter 11

Case No. 19-11466 (MFW)

(Jointly Administered)

Adv. Proc. No. 21-50920 (MFW)

Re: Adv. D.I. 61

NOTICE OF COMPLETION OF BRIEFING

Pursuant to Rule 7007-4 of the Local Rules of Bankruptcy Procedure of the United States Bankruptcy Court for the District of Delaware, Defendant Medline Industries Inc., by and through its undersigned counsel, hereby notifies the Court that briefing has been completed with respect to its *Motion for Summary Judgment* [Adv. D.I. 61] ("Motion").

¹ The Debtors in these cases, along with the last four digits of each Debtor's federal tax identification number, are: Center City Healthcare, LLC (3341), Philadelphia Academic Health System, LLC (8681), St. Christopher's Healthcare, LLC (8395), Philadelphia Academic Medical Associates, LLC (8165), HPS of PA, L.L.C. (1617), SCHC Pediatric Associates, L.L.C. (0527), St. Christopher's Pediatric Urgent Care Center, L.L.C. (6447), SCHC Pediatric Anesthesia Associates, L.L.C. (2326), St. Chris Care at Northeast Pediatrics, L.L.C. (4056), TPS of PA, L.L.C. (4862), TPS II of PA, L.L.C. (5534), TPS III of PA, L.L.C. (5536), TPS IV of PA, L.L.C. (5537), and TPS V of PA, L.L.C. (5540). The Debtors' mailing address is 216 North Broad Street, 4th Floor, Philadelphia, Pennsylvania 19102.

Pleadings relevant to the Motion are as follows:

1. Plaintiffs' Complaint for Avoidance and Recovery of Transfers Pursuant to 11 U.S.C. §§ 547, 548 & 550 and to Disallow Claims Pursuant to 11 U.S.C. § 502(d) [filed on 06/25/2021; Adv. D.I. [1](#)]
2. Defendant Medline Industries Inc.'s Motion for Summary Judgment [filed on 11/17/2023; Adv. D.I. [61](#)];
3. Brief in Support of Defendant Medline Industries Inc.'s Motion for Summary Judgment [filed on 11/17/2023; Adv. D.I. [62](#)];
4. Statement of Undisputed Material Facts in Support of Defendant Medline Industries Inc.'s Motion for Summary Judgment [filed on 11/17/2023; Adv. D.I. [63](#)];
5. Declaration of Michael A. Kaplan in Support of Defendant Medline Industries Inc.'s Motion for Summary Judgment and Exhibits thereto [filed on 11/17/2023; Adv. D.I. [64](#)];
6. Declaration of Shane Reed in Support of Defendant Medline Industries Inc.'s Motion for Summary Judgment and Exhibits thereto [filed on 11/17/2023; Adv. D.I. [65](#)];
7. Declaration of Vincenzo Toppi in Support of Defendant Medline Industries Inc.'s Motion for Summary Judgment and Exhibits thereto [filed on 11/17/2023; Adv. D.I. [66](#)];
8. Plaintiffs' Response to Defendant's Motion for Summary Judgment and Statement of Undisputed Material Facts [filed on 12/12/2023; Adv. D.I. [71](#)];
9. Plaintiffs' Brief in Opposition to Defendant's Motion for Summary Judgment [filed on 12/12/2023; Adv. D.I. [72](#)];
10. Declaration of Susannah Prill in Support of Plaintiffs' Brief in Opposition to Defendant's Motion for Summary Judgment and Exhibits thereto [filed on 12/12/2023; Adv. D.I. [73](#)];

11. Declaration of William Pederson in Support of Plaintiffs' Brief in Opposition to Defendant's Motion for Summary Judgment and Exhibits thereto [filed on 12/12/2023; Adv. D.I. [74](#)];

12. Appendix to Plaintiffs' Brief in Opposition to Defendant's Motion for Summary Judgment and Exhibits thereto [filed on 12/12/2023; Adv. D.I. [75](#)];

13. Reply Brief in Support of Defendant Medline Industries Inc.'s Motion for Summary Judgment [filed on 12/29/2023; Adv. D.I. [76](#)]; and

14. Supplemental Declaration of Michael A. Kaplan in support of Medline Industries Inc.'s Reply Brief and Exhibits thereto [filed on 12/29/2023; Adv. D.I. [77](#)].

The aforementioned documents will be delivered to Chambers with this Notice of Completion of Briefing.

Dated: January 8, 2024
Wilmington, Delaware

Respectfully submitted,

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